## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA CHARLESTON DIVISION

NELSON L. BRUCE,	)
Plaintiff,	)
v.	)
PENTAGON FEDERAL CREDIT UNION a/k/a PENTAGON FEDERAL CREDIT UNION FOUNDATION, EXPERIAN INFORMATION SOLUTIONS, INC., TRANS UNION, LLC, EQUIFAX INFORMATION SERVICES, LLC, LEXISNEXIS RISK SOLUTIONS, INC., and UNKNOWN DOES 1-100,  Defendants.	) ) CASE NO.: 2:22-cv-02211-BHH-MGB ) ) ) )

# DEFENDANT TRANS UNION LLC'S CLARIFICATION REGARDING MOTION TO DISMISS PLAINTIFF'S THIRD AMENDED COMPLAINT

COMES NOW, Trans Union LLC ("Trans Union"), and files its Clarification regarding its Motion to Dismiss Plaintiff's Third Amended Complaint ("Motion to Dismiss"), and would respectfully show the Court as follows:

- 1. On June 13, 2024, Trans Union filed its Motion to Dismiss. In the Motion to Dismiss, Trans Union makes reference to "Trans Union's Reinvestigation Results (ECF 163-3 at p. 36)" and "ECF 163-3 at pp. 75-76."
- 2. As pointed out by the Court in its August 29, 2024 text order requiring clarification, there are no corresponding exhibits at ECF No. 163. ECF No. 258
- 3. Trans Union apologizes for the confusion caused and clarifies that the documents referenced in its Motion to Dismiss can be found at ECF No. 1-3 at pp. 33-36 and ECF No. 1-3 at pp. 73–76, respectively.

# Respectfully Submitted,

### s/ Wilbur E. Johnson

Wilbur E. Johnson

wjohnson@ycrlaw.com

Federal ID No.: 2212

Clement Rivers, LLP

25 Calhoun Street, Suite 400

Charleston, SC 29401

(843) 724-6659

(843) 579-1332 Fax

and

Kyle Pietrzak, Esq.

(admitted *Pro Hac Vice*)

kpietrzak@qslwm.com

Quilling, Selander, Lownds, Winslett & Moser, P.C.

6900 N Dallas Parkway, Suite 800

Plano, TX 75024

(214) 560-5458

(214) 871-2111 Fax

Counsel for Trans Union LLC

Date: August 29, 2024

#### **CERTIFICATE OF SERVICE**

I hereby certify that on the 29<sup>th</sup> day of August 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel of record registered to use the CM/ECF system in this action, as follows:

G. Troy Thames tthames@wjlaw.net

Willson Jones Carter and Baxley 421 Wando Park Boulevard, Suite 100

Mt Pleasant, SC 29464 (843) -284-0832 (843) 284-1081 Fax

and

Michael A. Graziano

mgraziano@eckertseamans.com

Sarah A. James

sjames@eckertseamans.com

Eckert Seamans Cherin and Mellott LLC 1717 Pennsylvania Avenue NW, Suite 1200

Washington, DC 20006

(202) 659-6671 (202)659-6699 Fax

Counsel for Pentagon Federal Credit Union a/k/a Pentagon Federal Credit Union

**Foundation** 

Lyndey Ritz Zwing Bryant lyndey.bryant@arlaw.com
Adams and Reese LLP
1221 Main Street, Suite 1200

Columbia, SC 29201 (803) 212-4958 (803) 779-4749 Fax

and

Grant Edward Schnell gschnell@jonesday.com

Jones Day

1221 Peachtree Street NE, Suite 400

Atlanta, GA 30361 (404) 581-8023

Counsel for Experian Information Solutions,

Inc.

Rita Bolt Barker rbarker@wyche.com

Wyche PA

200 E Broad Street, Suite 400 Greenville, SC 29601-2892

(864) 242-8235

and

Eric F. Barton

ebarton@seyfarth.com Seyfarth Shaw LLP

1075 Peachtree Street NE, Suite 2500

Atlanta, GA 30309 (404) 885-1500

Counsel for Equifax Information Services,

LLC

William Joseph Farley, III
will.farley@troutman.com
Troutman Sanders LLP

301 S Tryon Street, Suite 3400

Charlotte, NC 28202 (704) 998-4099

and

Susan Jean Lloyd

susie.lloyd@troutman.com

Troutman Pepper

301 South College Street, Suite 3400

Charlotte, NC 28202 (724) 561-7546

Counsel for LexisNexis Risk Solutions, Inc.

I further certify that I forwarded a copy of the foregoing by U.S. First Class Mail to the following non-CM/ECF participants:

Nelson L. Bruce <u>leonbruce81@yahoo.com</u> PO BOX 3345 Summerville, SC 29484-3345 *Pro Se Plaintiff* 

s/Wilbur E. Johnson

WILBUR E. JOHNSON